

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON; STATE OF CONNECTICUT; STATE OF MARYLAND; STATE OF NEW JERSEY; STATE OF NEW YORK; STATE OF OREGON; COMMONWEALTH OF MASSACHUSETTS; COMMONWEALTH OF PENNSYLVANIA; DISTRICT OF COLUMBIA; STATE OF CALIFORNIA; STATE OF COLORADO; STATE OF DELAWARE; STATE OF HAWAII; STATE OF ILLINOIS; STATE OF IOWA; STATE OF MINNESOTA; STATE OF NORTH CAROLINA; STATE OF RHODE ISLAND; STATE OF VERMONT, and COMMONWEALTH OF VIRGINIA,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF STATE; MICHAEL R. POMPEO, in his official capacity as Secretary of State; DIRECTORATE OF DEFENSE TRADE CONTROLS; MIKE MILLER, in his official capacity as Acting Deputy Assistant Secretary of Defense Trade Controls; SARAH HEIDEMA, in her official capacity as Director of Policy, Office of Defense Trade Controls Policy; DEFENSE DISTRIBUTED; SECOND AMENDMENT FOUNDATION, INC.; AND CONN WILLIAMSON,

Defendants.

ANSWER OF DEFENDANTS DEFENSE DISTRIBUTED, SECOND AMENDMENT FOUNDATION, AND CONN WILLIAMSON
No. 2:18-cv-01115-RSL

NO.: 2:18-cv-01115-RSL

**ANSWER OF DEFENDANTS
DEFENSE DISTRIBUTED,
SECOND AMENDMENT
FOUNDATION, AND CONN
WILLIAMSON TO FIRST
AMENDED COMPLAINT FOR
DECLARATORY RELIEF**

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1 Defendants Defense Distributed, Second Amendment Foundation, and Conn
 2 Williamson (collectively “Defendants”) answer the allegations of Plaintiffs’ Amended
 3 Complaint, Dkt. 29, as follows, each paragraph hereof being responsive to the corresponding
 4 numbered paragraph of the Complaint.

5 1. Paragraph 1 of Plaintiffs’ Amended Complaint alleges legal conclusions that do
 6 not require a response. To the extent a response is required, Defendants respond that any
 7 person with Internet access already has access to 3-D CAD and other files at issue in this
 8 action. Defendants deny the remaining allegations of this paragraph of Plaintiffs’ Amended
 9 Complaint.

10 2. In response to paragraph 2 of Plaintiffs’ Amended Complaint, Defendants admit
 11 only that the United States Department of State, the Secretary of State, the Directorate of
 12 Defense Trade Controls (“DDTC”), the Deputy Assistant Secretary, Defense Trade Controls,
 13 and the Director, Office of Defense Trade Controls Policy agreed to the terms of the Settlement
 14 Agreement entered into between the parties in *Defense Distributed v. U.S. Dept. of State*, 1:15-
 15 CV-372 RP (W.D. Texas) (the “Prior Action”). Defendants deny the remaining allegations of
 16 this paragraph of Plaintiffs’ Amended Complaint.

17 3. In response to paragraph 3 of Plaintiffs’ Amended Complaint, Defendants admit
 18 only that, on July 27, 2018, a notice was published at www.pmddtc.state.gov. Defendants
 19 deny that the Ghost Gunner machine is subject to the ITAR. Defendants deny the remaining
 20 allegations of this paragraph of Plaintiffs’ Amended Complaint.

21 4. Paragraph 4 of Plaintiffs’ Amended Complaint alleges legal conclusions that do
 22 not require a response. To the extent a response is required, Defendants admit only that

1 consistent with the Settlement Agreement in the Prior Action and its rights under the First and
2 Second Amendments, Defense Distributed announced a plan to publish certain files relating
3 to 3-D printing of firearms on August 1, 2018. Defendants deny the remaining allegations of
4 this paragraph of Plaintiffs' Amended Complaint.

5 5. In response to paragraph 5 of Plaintiffs' Amended Complaint, Defendants admit
6 only that, consistent with the Settlement in the Prior Action and its rights under the First and
7 Second Amendments, Defense Distributed planned to publish certain files relating to 3-D
8 printing of firearms. Defendants deny the remaining allegations of this paragraph of Plaintiffs'
9 Amended Complaint.

10 6. In response to paragraph 6 of Plaintiffs' Amended Complaint, Defendants
11 respond that they lack information or knowledge sufficient to form a belief as to the content
12 of news reports. Defendants therefore deny the allegations of this paragraph of Plaintiffs'
13 Amended Complaint.

14 7. Defendants deny the allegations of paragraph 7 of Plaintiffs' Amended
15 Complaint.

16 8. Defendants deny the allegations of paragraph 8 of Plaintiffs' Amended
17 Complaint.

18 9. Defendants deny the allegations of paragraph 9 of Plaintiffs' Amended
19 Complaint.

20 10. In response to paragraph 10 of Plaintiffs' Amended Complaint, Defendants
21 admit only that the Government published certain notices of proposed rulemaking. Defendants
22 deny the remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

1 11. Defendants deny the allegations of paragraph 11 of Plaintiffs' Amended
2 Complaint.

3 12. Defendants deny the allegations of paragraph 12 of Plaintiffs' Amended
4 Complaint.

5 13. Defendants deny the allegations of paragraph 13 of Plaintiffs' Amended
6 Complaint.

7 14. In response to paragraph 14 of Plaintiffs' Amended Complaint, Defendants
8 admit only that Defendant Second Amendment Foundation, Inc., is located in Bellevue,
9 Washington. Defendants deny the remaining allegations of this paragraph of Plaintiffs'
10 Amended Complaint.

11 15. In response to paragraph 15 of Plaintiffs' Amended Complaint, Defendants
12 admit only that the States of Washington, Connecticut, Maryland, New Jersey, New York,
13 Oregon, California, Colorado, Delaware, Hawaii, Illinois, Iowa, Minnesota, North Carolina,
14 Rhode Island, Vermont and Virginia, the Commonwealths of Massachusetts and
15 Pennsylvania, represented by and through their respective Attorneys General, are sovereign
16 states of the United States of America. Defendants deny the remaining allegations of this
17 paragraph of Plaintiffs' Amended Complaint.

18 16. Paragraph 16 of Plaintiffs' Amended Complaint alleges legal conclusions that
19 do not require a response. To the extent a response is required, Defendants deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 17. Defendants deny the allegations of paragraph 17 of Plaintiffs' Amended
22 Complaint.

1 18. Defendants deny the allegations of paragraph 18 of Plaintiffs' Amended
2 Complaint.

3 19. Defendants admit the allegations of paragraph 19 of Plaintiffs' Amended
4 Complaint.

5 20. Defendants admit the allegations of paragraph 20 of Plaintiffs' Amended
6 Complaint.

7 21. In response to paragraph 21 of Plaintiffs' Amended Complaint, Defendants deny
8 that DDTC "enacted" a temporary modification. Defendants admit only that DDTC is a
9 subordinate unit within the Department of State responsible for administering and enforcing
10 the ITAR, that DDTC issued a temporary authorization under ITAR Section 126.2, and that
11 DDTC is a party to the Settlement Agreement. Defendants deny any remaining allegations of
12 this paragraph of Plaintiffs' Amended Complaint.

13 22. Defendants admit the allegations of paragraph 22 of Plaintiffs' Amended
14 Complaint.

15 23. Defendants admit the allegations of paragraph 23 of Plaintiffs' Amended
16 Complaint.

17 24. In response to paragraph 24 of Plaintiffs' Amended Complaint, Defendants
18 admit only that Defense Distributed is a Texas corporation with its headquarters and principal
19 place of business in Austin, Texas; that Defense Distributed advertises and sells products on
20 its website; and that, consistent with the Settlement Agreement in the Prior Action and its
21 rights under the First and Second Amendments, Defense Distributed planned to publish to the
22 Internet certain files relating to 3-D printing of firearms on August 1, 2018. The remaining

1 allegations of this paragraph of Plaintiffs' Amended Complaint include legal conclusions that
2 do not require a response. To the extent a response to these remaining allegations is required,
3 Defendants deny these remaining allegations of this paragraph of Plaintiffs' Amended
4 Complaint.

5 25. In response to paragraph 25 of Plaintiffs' Amended Complaint, Defendants
6 admit only that Defendant Second Amendment Foundation, is a non-profit organization
7 incorporated under the laws of Washington with its principal place of business in Bellevue,
8 Washington. The remaining allegations of this paragraph of Plaintiffs' Amended Complaint
9 constitute legal conclusions that do not require a response. To the extent a response to these
10 remaining allegations is required, Defendants deny these remaining allegations of this
11 paragraph of Plaintiffs' Amended Complaint.

12 26. In response to paragraph 26 of Plaintiffs' Amended Complaint, Defendants
13 admit only that Conn Williamson is a citizen of the State of Washington. The remaining
14 allegations of this paragraph of Plaintiffs' Amended Complaint constitute statements legal
15 conclusions that do not require a response. To the extent a response to these remaining
16 allegations is required, Defendants deny these remaining allegations of this paragraph of
17 Plaintiffs' Amended Complaint.

18 27. Paragraph 27 of Plaintiffs' Amended Complaint cites a law and alleges legal
19 conclusions that do not require a response. To the extent a response is required, Defendants
20 deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

21 28. Paragraph 28 of Plaintiffs' Amended Complaint cites a law and alleges legal
22 conclusions that do not require a response. To the extent a response is required, Defendants

1 deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

2 29. Paragraph 29 of Plaintiffs' Amended Complaint cites a law and alleges legal
 3 conclusions that do not require a response. To the extent a response is required, Defendants
 4 deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

5 30. In response to paragraph 30 of Plaintiffs' Amended Complaint, Defendants
 6 admit only that Lisa Aguirre submitted a declaration in the Prior Action. Defendants deny the
 7 factual accuracy of the contents of the document and deny any other remaining allegations of
 8 this paragraph of Plaintiffs' Amended Complaint.

9 31. Paragraph 31 of Plaintiffs' Amended Complaint cites an Executive Order and
 10 alleges legal conclusions that do not require a response. To the extent a response is required,
 11 Defendants deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

12 32. Paragraph 32 of Plaintiffs' Amended Complaint cites an Executive order and
 13 alleges legal conclusions that do not require a response. To the extent a response is required,
 14 Defendants deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

15 33. Paragraph 33 of Plaintiffs' Amended Complaint cites laws and alleges legal
 16 conclusions that do not require a response. To the extent a response is required, Defendants
 17 deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

18 34. Paragraph 34 of Plaintiffs' Amended Complaint cites a law and alleges legal
 19 conclusions that do not require a response. To the extent a response is required, Defendants
 20 deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

21 35. Paragraph 35 of Plaintiffs' Amended Complaint cites a law and alleges legal
 22 conclusions that do not require a response. To the extent a response is required, Defendants

1 deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

2 36. In response to paragraph 36 of Plaintiffs' Amended Complaint, Defendants
3 admit only that Lisa Aguirre submitted a declaration in the Prior Action. Defendants deny the
4 factual accuracy of the contents of the document and deny any other remaining allegations of
5 this paragraph of Plaintiffs' Amended Complaint.

6 37. Paragraph 37 of Plaintiffs' Amended Complaint cites a law and alleges legal
7 conclusions that do not require a response. To the extent a response is required, Defendants
8 deny these allegations of this paragraph of Plaintiffs' Amended Complaint.

9 38. In response to Paragraph 38 of Plaintiffs' Amended Complaint, Defendants
10 admit only that Defense Distributed is a Texas corporation founded by Cody Wilson.
11 Defendants deny the remaining allegations of this paragraph of Plaintiffs' Amended
12 Complaint.

13 39. In response to paragraph 39 of Plaintiffs' Amended Complaint, Defendants
14 admit only that Defense Distributed began posting technical information regarding a number
15 of gun-related items, including a trigger guard, grips, two receivers, a magazine for AR-15
16 rifles, and a handgun on the Internet prior to or around May 2013. Defendants deny the
17 remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

18 40. In response to paragraph 40 of Plaintiffs' Amended Complaint, Defendants
19 admit only that Defense Distributed described certain data files as "essentially blueprints that
20 can be read by CAD software" in document located at Docket No. 8-4 at App. 208 of the Prior
21 Action. Defendants deny Plaintiffs' description of weapons manufacturing and deny the
22 remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

1 41. In response to paragraph 41 of Plaintiffs' Amended Complaint, Defendants
2 admit only that the Office of Defense Trade Controls Compliance is responsible for civil
3 enforcement of AECA and ITAR. Defendants deny the remaining allegations of this
4 paragraph of Plaintiffs' Amended Complaint.

5 42. In response to paragraph 42 of Plaintiffs' Amended Complaint, Defendants
6 admit only that the State Department issued a final determination responding to Defense
7 Distributed's commodity jurisdiction request; and that, in the final determination, the State
8 Department advised that the Ghost Gunner machine was not subject to the export jurisdiction
9 of the State Department under the ITAR; and that the State Department advised that certain
10 files were subject to the export jurisdiction of the State Department under the ITAR, and that
11 certain files were not subject to the export jurisdiction of the State Department under the ITAR.

12 43. In response to paragraph 43 of Plaintiffs' Amended Complaint, Defendants
13 admit only that the State Department issued a final determination responding to Defense
14 Distributed's commodity jurisdiction request; and that, in the final determination, the State
15 Department advised that certain files were subject to the export jurisdiction of the State
16 Department under the ITAR, and that certain files were not subject to the export jurisdiction
17 of the State Department under the ITAR.

18 44. In response to paragraph 44 of Plaintiffs' Amended Complaint, Defendants
19 admit only that the State Department issued a final determination responding to Defense
20 Distributed's commodity jurisdiction request. Defendants deny the remaining allegations of
21 this paragraph of Plaintiffs' Amended Complaint.

22 45. Defendants admit the allegations of paragraph 45 of Plaintiffs' Amended

ANSWER OF DEFENDANTS DEFENSE
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1 Complaint.

2 46. In response to paragraph 46 of Plaintiffs' Amended Complaint, Defendants
 3 admit only that, in defending against the Prior Action, the Government filed certain documents
 4 with the district court. Defendants deny the remaining allegations of this paragraph of
 5 Plaintiffs' Amended Complaint.

6 47. In response to paragraph 47 of Plaintiffs' Amended Complaint, Defendants
 7 admit only that Lisa Aguirre submitted a declaration in the Prior Action. Defendants deny the
 8 factual accuracy of the contents of the document and deny any other remaining allegations of
 9 this paragraph of Plaintiffs' Amended Complaint.

10 48. In response to paragraph 48 of Plaintiffs' Amended Complaint, Defendants
 11 admit only that the court did not issue a preliminary injunction. Defendants deny the
 12 remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

13 49. In response to paragraph 49 of Plaintiffs' Amended Complaint, Defendants
 14 admit only that the Fifth Circuit affirmed the District Court's decision without reaching the
 15 merits in the Prior Action. Defendants deny the other allegations of this paragraph of
 16 Plaintiffs' Amended Complaint.

17 50. Defendants admit the allegation of paragraph 50 of Plaintiffs' Amended
 18 Complaint.

19 51. In response to paragraph 51 of Plaintiffs' Amended Complaint, Defendants
 20 admit only that the Government filed a motion to dismiss in the Prior Action after the district
 21 court lifted the stay of proceedings. Defendants deny the remaining allegations of this
 22 paragraph of Plaintiffs' Amended Complaint.

1 52. In response to paragraph 52 of Plaintiffs' Amended Complaint, Defendants
 2 admit only that Defense Distributed announced the settlement of the Prior Action in July 2018,
 3 and that the parties in the Prior Action filed a stipulation of dismissal with prejudice on July
 4 27, 2018. To the extent this paragraph cites news reports, Defendants lack information or
 5 knowledge sufficient to form a belief as to the truth of these allegations, and therefore deny
 6 these allegations. Defendants deny the remaining allegations of this paragraph of Plaintiffs'
 7 Amended Complaint.

8 53. In response to paragraph 53 of Plaintiffs' Amended Complaint, Defendants
 9 admit that the Settlement Agreement was executed on June 29, 2018, and made public in July
 10 2018. Defendants deny the remaining allegations of this paragraph of Plaintiffs' Amended
 11 Complaint.

12 54. In response to paragraph 54 of Plaintiffs' Amended Complaint, Defendants
 13 admit only that the Settlement Agreement contains various paragraphs, to include paragraph
 14 1, which sets forth certain Government obligations. Defendants deny the remaining
 15 allegations of this paragraph of Plaintiffs' Amended Complaint.

16 55. In response to paragraph 55 of Plaintiffs' Amended Complaint, Defendants
 17 admit only that the Settlement Agreement applies to technical data that is the subject of the
 18 Prior Action. Defendants deny the allegations of this paragraph of Plaintiffs' Amended
 19 Complaint.

20 56. Defendants deny the allegations of paragraph 56 of Plaintiffs' Amended
 21 Complaint.,

22 57. In response to paragraph 57 of Plaintiffs' Amended Complaint, Defendants deny

1 that any Congressional notification was required and therefore deny the allegations of this
2 paragraph of Plaintiffs' Amended Complaint.

3 58. In response to paragraph 58 of Plaintiffs' Amended Complaint, Defendants deny
4 that any Secretary of Defense concurrence or any commodity jurisdiction request was required
5 and therefore deny the allegations of this paragraph of Plaintiffs' Amended Complaint.

6 59. In response to paragraph 59 of Plaintiffs' Amended Complaint, Defendants
7 admit only that Cody Wilson and Defense Distributed have made public statements about the
8 Settlement Agreement. Defendants deny the remaining allegations of this paragraph of
9 Plaintiffs' Amended Complaint.

10 60. In response to paragraph 60 of Plaintiffs' Amended Complaint, Defendants
11 admit only that the Government published certain notices of proposed rulemaking. Defendants
12 deny the remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

13 61. In response to paragraph 61 of Plaintiffs' Amended Complaint, Defendants
14 admit only that the Government published certain notices of proposed rulemaking. Defendants
15 deny the remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

16 62. In response to paragraph 62 of Plaintiffs' Amended Complaint, Defendants
17 admit only that the Government published certain notices of proposed rulemaking. Defendants
18 deny the remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

19 63. In response to paragraph 63 of Plaintiffs' Amended Complaint, and upon
20 information and belief, Defendants admit only that the public comment period for the proposed
21 rule concluded on July 9, 2018. Defendants deny the remaining allegations of this paragraph
22 of Plaintiffs' Amended Complaint.

1 64. In response to paragraph 64 of Plaintiffs' Amended Complaint, Defendants
 2 admit only that, on July 27, 2018, a notice was published at www.pmddtc.state.gov titled,
 3 "Temporary Modification of Category I of the United States Munitions List." Defendants
 4 deny the remaining allegations of this paragraph of Plaintiffs' Amended Complaint.

5 65. Defendants deny the allegations contained in paragraph 65 of Plaintiffs'
 6 Amended Complaint.

7 66. Defendants deny the allegations contained in paragraph 66 of Plaintiffs'
 8 Amended Complaint.

9 67. Paragraph 67 of Plaintiffs' Amended Complaint discusses laws and alleges legal
 10 conclusions that do not require a response. Defendants lack information or knowledge
 11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
 12 of this paragraph of Plaintiffs' Amended Complaint.

13 68. Paragraph 68 of Plaintiffs' Amended Complaint discusses laws and alleges a
 14 legal conclusion that does not require a response. Defendants lack information or knowledge
 15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
 16 of this paragraph of Plaintiffs' Amended Complaint.

17 69. Paragraph 69 of Plaintiffs' Amended Complaint discusses laws and alleges legal
 18 conclusions that do not require a response. Defendants lack information or knowledge
 19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
 20 of this paragraph of Plaintiffs' Amended Complaint.

21 70. Defendants deny the allegations of paragraph 70 of Plaintiffs' Amended
 22 Complaint.

1 71. Defendants deny the allegations of paragraph 71 of Plaintiffs' Amended
2 Complaint.

3 72. Paragraph 72 of Plaintiffs' Amended Complaint cites laws and alleges legal
4 conclusions that do not require a response. Defendants lack information or knowledge
5 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
6 of this paragraph of Plaintiffs' Amended Complaint.

7 73. Paragraph 73 of Plaintiffs' Amended Complaint cites laws and alleges legal
8 conclusions that do not require a response. Defendants lack information or knowledge
9 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
10 of this paragraph of Plaintiffs' Amended Complaint.

11 74. Paragraph 74 of Plaintiffs' Amended Complaint cites laws and alleges legal
12 conclusions that do not require a response. Defendants lack information or knowledge
13 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
14 of this paragraph of Plaintiffs' Amended Complaint.

15 75. Defendants deny the allegations of paragraph 75 of Plaintiffs' Amended
16 Complaint.

17 76. Defendants deny the allegations of paragraph 76 of Plaintiffs' Amended
18 Complaint.

19 77. In response to paragraph 77 of Plaintiffs' Amended Complaint, Defendants
20 admit only that, upon information and belief, Amazon sells 3-D printers on its website.
21 Defendants lack information or knowledge sufficient to form a belief as to the truth of the
22 remaining allegations of this paragraph and therefore deny the allegations of this paragraph of

1 Plaintiffs' Amended Complaint.

2 78. Defendants deny the allegations of paragraph 78 of Plaintiffs' Amended
3 Complaint.

4 79. Defendants deny the allegations of paragraph 79 of Plaintiffs' Amended
5 Complaint.

6 80. Paragraph 80 of Plaintiffs' Amended Complaint discusses laws and alleges legal
7 conclusions that do not require a response. Defendants lack information or knowledge
8 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
9 of this paragraph of Plaintiffs' Amended Complaint.

10 81. Paragraph 81 of Plaintiffs' Amended Complaint cites laws and alleges legal
11 conclusions that do not require a response. Defendants lack information or knowledge
12 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
13 of this paragraph of Plaintiffs' Amended Complaint.

14 82. Paragraph 82 of Plaintiffs' Amended Complaint cites laws and alleges legal
15 conclusions that do not require a response. Defendants lack information or knowledge
16 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
17 of this paragraph of Plaintiffs' Amended Complaint.

18 83. Paragraph 83 of Plaintiffs' Amended Complaint cites a law and alleges legal
19 conclusions that do not require a response. Defendants lack information or knowledge
20 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
21 of this paragraph of Plaintiffs' Amended Complaint.

22 84. Paragraph 84 of Plaintiffs' Amended Complaint cites a law and alleges legal

1 conclusions that do not require a response. Defendants lack information or knowledge
2 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
3 of this paragraph of Plaintiffs' Amended Complaint.

4 85. Paragraph 85 of Plaintiffs' Amended Complaint cites a law and alleges legal
5 conclusions that do not require a response. Defendants lack information or knowledge
6 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
7 of this paragraph of Plaintiffs' Amended Complaint.

8 86. Paragraph 86 of Plaintiffs' Amended Complaint cites laws and alleges legal
9 conclusions that do not require a response. Defendants lack information or knowledge
10 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
11 of this paragraph of Plaintiffs' Amended Complaint.

12 87. Paragraph 87 of Plaintiffs' Amended Complaint cites laws and alleges legal
13 conclusions that do not require a response. Defendants lack information or knowledge
14 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
15 of this paragraph of Plaintiffs' Amended Complaint.

16 88. Paragraph 88 of Plaintiffs' Amended Complaint cites a law and alleges legal
17 conclusions that do not require a response. Defendants lack information or knowledge
18 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
19 of this paragraph of Plaintiffs' Amended Complaint.

20 89. Paragraph 89 of Plaintiffs' Amended Complaint cites laws and alleges legal
21 conclusions that do not require a response. Defendants lack information or knowledge
22 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations

1 of this paragraph of Plaintiffs' Amended Complaint.

2 90. Paragraph 90 of Plaintiffs' Amended Complaint cites a law and alleges legal
3 conclusions that do not require a response. Defendants lack information or knowledge
4 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
5 of this paragraph of Plaintiffs' Amended Complaint.

6 91. Defendants deny the allegations of paragraph 91 of Plaintiffs' Amended
7 Complaint.

8 92. Defendants deny the allegations of paragraph 92 of Plaintiffs' Amended
9 Complaint.

10 93. Defendants deny the allegations of paragraph 93 of Plaintiffs' Amended
11 Complaint.

12 94. Paragraph 94 of Plaintiffs' Amended Complaint cites laws and alleges legal
13 conclusions that do not require a response. Defendants lack information or knowledge
14 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
15 of this paragraph of Plaintiffs' Amended Complaint.

16 95. Paragraph 95 of Plaintiffs' Amended Complaint cites laws and alleges legal
17 conclusions that do not require a response. Defendants lack information or knowledge
18 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
19 of this paragraph of Plaintiffs' Amended Complaint.

20 96. Paragraph 96 of Plaintiffs' Amended Complaint cites laws and alleges legal
21 conclusions that do not require a response. Defendants lack information or knowledge
22 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations

1 of this paragraph of Plaintiffs' Amended Complaint.

2 97. Defendants deny the allegations of paragraph 97 of Plaintiffs' Amended
3 Complaint.

4 98. Paragraph 98 of Plaintiffs' Amended Complaint cites laws and alleges legal
5 conclusions that do not require a response. Defendants lack information or knowledge
6 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
7 of this paragraph of Plaintiffs' Amended Complaint.

8 99. Paragraph 99 of Plaintiffs' Amended Complaint cites laws and alleges legal
9 conclusions that do not require a response. Defendants lack information or knowledge
10 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
11 of this paragraph of Plaintiffs' Amended Complaint.

12 100. Paragraph 100 of Plaintiffs' Amended Complaint cites a law and alleges legal
13 conclusions that do not require a response. Defendants lack information or knowledge
14 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
15 of this paragraph of Plaintiffs' Amended Complaint.

16 101. Paragraph 101 of Plaintiffs' Amended Complaint cites laws and alleges legal
17 conclusions that do not require a response. Defendants lack information or knowledge
18 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
19 of this paragraph of Plaintiffs' Amended Complaint.

20 102. Paragraph 102 of Plaintiffs' Amended Complaint cites laws and alleges legal
21 conclusions that do not require a response. Defendants lack information or knowledge
22 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations

1 of this paragraph of Plaintiffs' Amended Complaint.

2 103. Paragraph 103 of Plaintiffs' Amended Complaint cites laws and alleges legal
3 conclusions that do not require a response. Defendants lack information or knowledge
4 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
5 of this paragraph of Plaintiffs' Amended Complaint.

6 104. Paragraph 104 of Plaintiffs' Amended Complaint cites laws and alleges legal
7 conclusions that do not require a response. Defendants lack information or knowledge
8 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
9 of this paragraph of Plaintiffs' Amended Complaint.

10 105. Paragraph 105 of Plaintiffs' Amended Complaint cites laws and alleges legal
11 conclusions that do not require a response. Defendants lack information or knowledge
12 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
13 of this paragraph of Plaintiffs' Amended Complaint.

14 106. Defendants deny the allegations of paragraph 106 of Plaintiffs' Amended
15 Complaint.

16 107. Paragraph 107 of Plaintiffs' Amended Complaint cites laws and alleges legal
17 conclusions that do not require a response. Defendants lack information or knowledge
18 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
19 of this paragraph of Plaintiffs' Amended Complaint.

20 108. Paragraph 108 of Plaintiffs' Amended Complaint cites laws and alleges legal
21 conclusions that do not require a response. Defendants lack information or knowledge
22 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations

1 of this paragraph of Plaintiffs' Amended Complaint.

2 109. Paragraph 109 of Plaintiffs' Amended Complaint cites laws and alleges legal
3 conclusions that do not require a response. Defendants lack information or knowledge
4 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
5 of this paragraph of Plaintiffs' Amended Complaint.

6 110. Paragraph 110 of Plaintiffs' Amended Complaint cites a law and alleges legal
7 conclusions that do not require a response. Defendants lack information or knowledge
8 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
9 of this paragraph of Plaintiffs' Amended Complaint.

10 111. Paragraph 111 of Plaintiffs' Amended Complaint discusses laws and alleges
11 legal conclusions that do not require a response. Defendants lack information or knowledge
12 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
13 of this paragraph of Plaintiffs' Amended Complaint.

14 112. Paragraph 112 of Plaintiffs' Amended Complaint cites a law and alleges legal
15 conclusions that do not require a response. Defendants lack information or knowledge
16 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
17 of this paragraph of Plaintiffs' Amended Complaint.

18 113. Paragraph 113 of Plaintiffs' Amended Complaint cites a law and alleges legal
19 conclusions that do not require a response. Defendants lack information or knowledge
20 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
21 of this paragraph of Plaintiffs' Amended Complaint.

22 114. Paragraph 114 of Plaintiffs' Amended Complaint cites laws and alleges legal

1 conclusions that do not require a response. Defendants lack information or knowledge
2 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
3 of this paragraph of Plaintiffs' Amended Complaint.

4 115. Paragraph 115 of Plaintiffs' Amended Complaint cites a law and alleges legal
5 conclusions that do not require a response. Defendants lack information or knowledge
6 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
7 of this paragraph of Plaintiffs' Amended Complaint.

8 116. Paragraph 116 of Plaintiffs' Amended Complaint cites a law and alleges legal
9 conclusions that do not require a response. Defendants lack information or knowledge
10 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
11 of this paragraph of Plaintiffs' Amended Complaint.

12 117. Paragraph 117 of Plaintiffs' Amended Complaint cites laws and alleges legal
13 conclusions that do not require a response. Defendants lack information or knowledge
14 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
15 of this paragraph of Plaintiffs' Amended Complaint.

16 118. Paragraph 118 of Plaintiffs' Amended Complaint cites a law and alleges legal
17 conclusions that do not require a response. Defendants lack information or knowledge
18 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
19 of this paragraph of Plaintiffs' Amended Complaint.

20 119. Paragraph 119 of Plaintiffs' Amended Complaint cites a law and alleges legal
21 conclusions that do not require a response. Defendants lack information or knowledge
22 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations

1 of this paragraph of Plaintiffs' Amended Complaint.

2 120. Paragraph 120 of Plaintiffs' Amended Complaint cites a law and alleges legal
3 conclusions that do not require a response. Defendants lack information or knowledge
4 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
5 of this paragraph of Plaintiffs' Amended Complaint.

6 121. Paragraph 121 of Plaintiffs' Amended Complaint cites laws and alleges legal
7 conclusions that do not require a response. Defendants lack information or knowledge
8 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
9 of this paragraph of Plaintiffs' Amended Complaint.

10 122. Paragraph 122 of Plaintiffs' Amended Complaint cites laws and alleges legal
11 conclusions that do not require a response. Defendants lack information or knowledge
12 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
13 of this paragraph of Plaintiffs' Amended Complaint.

14 123. Paragraph 123 of Plaintiffs' Amended Complaint cites a law and alleges legal
15 conclusions that do not require a response. Defendants lack information or knowledge
16 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
17 of this paragraph of Plaintiffs' Amended Complaint.

18 124. Paragraph 124 of Plaintiffs' Amended Complaint cites laws and alleges legal
19 conclusions that do not require a response. Defendants lack information or knowledge
20 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
21 of this paragraph of Plaintiffs' Amended Complaint.

22 125. Paragraph 125 of Plaintiffs' Amended Complaint cites a law and alleges legal

1 conclusions that do not require a response. Defendants lack information or knowledge
2 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
3 of this paragraph of Plaintiffs' Amended Complaint.

4 126. Paragraph 126 of Plaintiffs' Amended Complaint cites a law and alleges legal
5 conclusions that do not require a response. Defendants lack information or knowledge
6 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
7 of this paragraph of Plaintiffs' Amended Complaint.

8 127. Defendants deny the allegations of paragraph 127 of Plaintiffs' Amended
9 Complaint.

10 128. Paragraph 128 of Plaintiffs' Amended Complaint discusses laws and alleges
11 legal conclusions that do not require a response. Defendants lack information or knowledge
12 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
13 of this paragraph of Plaintiffs' Amended Complaint.

14 129. Paragraph 129 of Plaintiffs' Amended Complaint cites laws and alleges legal
15 conclusions that do not require a response. Defendants lack information or knowledge
16 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
17 of this paragraph of Plaintiffs' Amended Complaint.

18 130. Paragraph 130 of Plaintiffs' Amended Complaint cites laws and alleges legal
19 conclusions that do not require a response. Defendants lack information or knowledge
20 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
21 of this paragraph of Plaintiffs' Amended Complaint.

22 131. Paragraph 131 of Plaintiffs' Amended Complaint cites a law and alleges legal

1 conclusions that do not require a response. Defendants lack information or knowledge
2 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
3 of this paragraph of Plaintiffs' Amended Complaint.

4 132. Defendants deny the allegations of paragraph 132 of Plaintiffs' Amended
5 Complaint.

6 133. Defendants deny the allegations of paragraph 133 of Plaintiffs' Amended
7 Complaint.

8 134. Paragraph 134 of Plaintiffs' Amended Complaint cites laws and alleges a legal
9 conclusion that does not require a response. Defendants lack information or knowledge
10 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
11 of this paragraph of Plaintiffs' Amended Complaint.

12 135. Defendants are without sufficient information or knowledge sufficient to form a
13 belief as to the truth of the allegations of paragraph 135 of Plaintiffs' Amended Complaint and
14 therefore deny the allegations of this paragraph of Plaintiffs' Amended Complaint

15 136. Defendants deny the allegations of paragraph 136 of Plaintiffs' Amended
16 Complaint.

17 137. Paragraph 137 of Plaintiffs' Amended Complaint cites laws and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 138. Paragraph 138 of Plaintiffs' Amended Complaint cites laws and alleges legal
22 conclusions that do not require a response. Defendants lack information or knowledge

1 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
2 of this paragraph of Plaintiffs' Amended Complaint.

3 139. Defendants deny the allegations of paragraph 139 of Plaintiffs' Amended
4 Complaint.

5 140. Paragraph 140 of Plaintiffs' Amended Complaint cites laws and alleges legal
6 conclusions that do not require a response. Defendants lack information or knowledge
7 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
8 of this paragraph of Plaintiffs' Amended Complaint.

9 141. Defendants deny the allegations of paragraph 141 of Plaintiffs' Amended
10 Complaint.

11 142. Paragraph 142 of Plaintiffs' Amended Complaint cites laws and alleges legal
12 conclusions that do not require a response. Defendants lack information or knowledge
13 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
14 of this paragraph of Plaintiffs' Amended Complaint.

15 143. Defendants deny the allegations of paragraph 143 of Plaintiffs' Amended
16 Complaint.

17 144. Paragraph 144 of Plaintiffs' Amended Complaint cites laws and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 145. Defendants deny the allegations of paragraph 145 of Plaintiffs' Amended
22 Complaint.

1 146. Paragraph 146 of Plaintiffs' Amended Complaint cites laws and alleges legal
2 conclusions that do not require a response. Defendants lack information or knowledge
3 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
4 of this paragraph of Plaintiffs' Amended Complaint.

5 147. Paragraph 147 of Plaintiffs' Amended Complaint cites laws and alleges legal
6 conclusions that do not require a response. Defendants lack information or knowledge
7 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
8 of this paragraph of Plaintiffs' Amended Complaint.

9 148. Paragraph 148 of Plaintiffs' Amended Complaint cites a law and alleges a legal
10 conclusion that does not require a response. Defendants lack information or knowledge
11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
12 of this paragraph of Plaintiffs' Amended Complaint.

13 149. Paragraph 149 of Plaintiffs' Amended Complaint cites laws and alleges legal
14 conclusions that do not require a response. Defendants lack information or knowledge
15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
16 of this paragraph of Plaintiffs' Amended Complaint.

17 150. Paragraph 150 of Plaintiffs' Amended Complaint cites laws and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 151. In response to paragraph 151 of Plaintiffs' Amended Complaint, Defendants
22 admit that mass shootings have occurred in Colorado. Defendants deny the allegations

1 regarding the temporary modification and lack information or knowledge sufficient to form a
2 belief as to the truth of the other allegations of this paragraph and therefore deny the remaining
3 allegations of this paragraph of Plaintiffs' Amended Complaint.

4 152. Paragraph 152 of Plaintiffs' Amended Complaint discusses laws and alleges
5 legal conclusions that do not require a response. Defendants lack information or knowledge
6 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
7 of this paragraph of Plaintiffs' Amended Complaint.

8 153. Paragraph 153 of Plaintiffs' Amended Complaint cites laws and alleges legal
9 conclusions that do not require a response. Defendants lack information or knowledge
10 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
11 of this paragraph of Plaintiffs' Amended Complaint.

12 154. Paragraph 154 of Plaintiffs' Amended Complaint cites laws and alleges legal
13 conclusions that do not require a response. Defendants lack information or knowledge
14 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
15 of this paragraph of Plaintiffs' Amended Complaint.

16 155. Paragraph 155 of Plaintiffs' Amended Complaint cites laws and alleges legal
17 conclusions that do not require a response. Defendants lack information or knowledge
18 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
19 of this paragraph of Plaintiffs' Amended Complaint.

20 156. Defendants deny the allegations of paragraph 156 of Plaintiffs' Amended
21 Complaint.

22 157. Paragraph 157 of Plaintiffs' Amended Complaint cites laws and alleges legal

1 conclusions that do not require a response. Defendants lack information or knowledge
2 sufficient to form a belief as to death rates and as to the truth of other allegations in this
3 paragraph and therefore deny the allegations of this paragraph of Plaintiffs' Amended
4 Complaint.

5 158. Paragraph 158 of Plaintiffs' Amended Complaint cites laws and alleges legal
6 conclusions that do not require a response. Defendants lack information or knowledge
7 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
8 of this paragraph of Plaintiffs' Amended Complaint.

9 159. Paragraph 159 of Plaintiffs' Amended Complaint cites a law and alleges a legal
10 conclusion that does not require a response. Defendants lack information or knowledge
11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
12 of this paragraph of Plaintiffs' Amended Complaint.

13 160. Paragraph 160 of Plaintiffs' Amended Complaint cites a law and alleges a legal
14 conclusion that does not require a response. Defendants lack information or knowledge
15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
16 of this paragraph of Plaintiffs' Amended Complaint.

17 161. Paragraph 161 of Plaintiffs' Amended Complaint cites laws and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 162. Defendants deny the allegations of paragraph 162 of Plaintiffs' Amended
22 Complaint.

1 163. Paragraph 163 of Plaintiffs' Amended Complaint cites laws and alleges legal
2 conclusions that do not require a response. Defendants lack information or knowledge
3 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
4 of this paragraph of Plaintiffs' Amended Complaint.

5 164. Paragraph 164 of Plaintiffs' Amended Complaint cites laws and alleges legal
6 conclusions that do not require a response. Defendants lack information or knowledge
7 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
8 of this paragraph of Plaintiffs' Amended Complaint.

9 165. Paragraph 165 of Plaintiffs' Amended Complaint cites laws and alleges legal
10 conclusions that do not require a response. Defendants lack information or knowledge
11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
12 of this paragraph of Plaintiffs' Amended Complaint.

13 166. Paragraph 166 of Plaintiffs' Amended Complaint cites a law and alleges a legal
14 conclusion that does not require a response. Defendants lack information or knowledge
15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
16 of this paragraph of Plaintiffs' Amended Complaint.

17 167. Paragraph 167 of Plaintiffs' Amended Complaint cites a law and alleges a legal
18 conclusion that does not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 168. Defendants deny the allegations of paragraph 168 of Plaintiffs' Amended
22 Complaint.

1 169. Paragraph 169 of Plaintiffs' Amended Complaint discusses laws and alleges
2 legal conclusions that do not require a response. Defendants lack information or knowledge
3 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
4 of this paragraph of Plaintiffs' Amended Complaint.

5 170. Paragraph 170 of Plaintiffs' Amended Complaint cites laws and alleges legal
6 conclusions that do not require a response. Defendants lack information or knowledge
7 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
8 of this paragraph of Plaintiffs' Amended Complaint.

9 171. Paragraph 171 of Plaintiffs' Amended Complaint cites laws and alleges legal
10 conclusions that do not require a response. Defendants lack information or knowledge
11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
12 of this paragraph of Plaintiffs' Amended Complaint.

13 172. Paragraph 172 of Plaintiffs' Amended Complaint cites a law and alleges legal
14 conclusions that do not require a response. Defendants lack information or knowledge
15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
16 of this paragraph of Plaintiffs' Amended Complaint.

17 173. Paragraph 173 of Plaintiffs' Amended Complaint cites a law and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 174. Paragraph 174 of Plaintiffs' Amended Complaint cites laws and alleges legal
22 conclusions that do not require a response. Defendants lack information or knowledge

1 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
2 of this paragraph of Plaintiffs' Amended Complaint.

3 175. Paragraph 175 of Plaintiffs' Amended Complaint cites laws and alleges legal
4 conclusions that do not require a response. Defendants lack information or knowledge
5 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
6 of this paragraph of Plaintiffs' Amended Complaint.

7 176. Paragraph 176 of Plaintiffs' Amended Complaint cites a law and alleges legal
8 conclusions that do not require a response. Defendants lack information or knowledge
9 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
10 of this paragraph of Plaintiffs' Amended Complaint.

11 177. Defendants deny the allegations of paragraph 177 of Plaintiffs' Amended
12 Complaint.

13 178. Paragraph 178 of Plaintiffs' Amended Complaint alleges a legal conclusion that
14 does not require a response. Defendants lack information or knowledge sufficient to form a
15 belief as to the truth of this allegation and therefore deny the allegation of this paragraph of
16 Plaintiffs' Amended Complaint.

17 179. Paragraph 179 of Plaintiffs' Amended Complaint cites laws and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 180. Paragraph 180 of Plaintiffs' Amended Complaint cites a law and alleges legal
22 conclusions that do not require a response. Defendants lack information or knowledge

1 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
2 of this paragraph of Plaintiffs' Amended Complaint.

3 181. Paragraph 181 of Plaintiffs' Amended Complaint cites a law and alleges legal
4 conclusions that do not require a response. Defendants lack information or knowledge
5 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
6 of this paragraph of Plaintiffs' Amended Complaint.

7 182. Paragraph 182 of Plaintiffs' Amended Complaint cites laws and alleges legal
8 conclusions that do not require a response. Defendants lack information or knowledge
9 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
10 of this paragraph of Plaintiffs' Amended Complaint.

11 183. Paragraph 183 of Plaintiffs' Amended Complaint cites laws and alleges legal
12 conclusions that do not require a response. Defendants lack information or knowledge
13 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
14 of this paragraph of Plaintiffs' Amended Complaint.

15 184. Paragraph 184 of Plaintiffs' Amended Complaint cites laws and alleges legal
16 conclusions that do not require a response. Defendants lack information or knowledge
17 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
18 of this paragraph of Plaintiffs' Amended Complaint.

19 185. Defendants deny the allegations of paragraph 185 of Plaintiffs' Amended
20 Complaint.

21 186. Paragraph 186 of Plaintiffs' Amended Complaint discusses laws and alleges
22 legal conclusions that do not require a response. Defendants lack information or knowledge

1 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
2 of this paragraph of Plaintiffs' Amended Complaint.

3 187. Paragraph 187 of Plaintiffs' Amended Complaint cites a law and alleges legal
4 conclusions that do not require a response. Defendants lack information or knowledge
5 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
6 of this paragraph of Plaintiffs' Amended Complaint.

7 188. Paragraph 188 of Plaintiffs' Amended Complaint cites a law and alleges legal
8 conclusions that do not require a response. Defendants lack information or knowledge
9 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
10 of this paragraph of Plaintiffs' Amended Complaint.

11 189. Paragraph 189 of Plaintiffs' Amended Complaint cites a law and alleges legal
12 conclusions that do not require a response. Defendants lack information or knowledge
13 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
14 of this paragraph of Plaintiffs' Amended Complaint.

15 190. Paragraph 190 of Plaintiffs' Amended Complaint cites a law and alleges legal
16 conclusions that do not require a response. Defendants lack information or knowledge
17 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
18 of this paragraph of Plaintiffs' Amended Complaint.

19 191. Paragraph 191 of Plaintiffs' Amended Complaint cites a law and alleges legal
20 conclusions that do not require a response. Defendants lack information or knowledge
21 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
22 of this paragraph of Plaintiffs' Amended Complaint.

1 192. Paragraph 192 of Plaintiffs' Amended Complaint cites a law and alleges legal
2 conclusions that do not require a response. Defendants lack information or knowledge
3 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
4 of this paragraph of Plaintiffs' Amended Complaint.

5 193. Paragraph 193 of Plaintiffs' Amended Complaint cites a law and alleges legal
6 conclusions that do not require a response. Defendants lack information or knowledge
7 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
8 of this paragraph of Plaintiffs' Amended Complaint.

9 194. Paragraph 194 of Plaintiffs' Amended Complaint cites a law and alleges legal
10 conclusions that do not require a response. Defendants lack information or knowledge
11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
12 of this paragraph of Plaintiffs' Amended Complaint.

13 195. Defendants deny the allegations of paragraph 195 of Plaintiffs' Amended
14 Complaint.

15 196. Paragraph 196 of Plaintiffs' Amended Complaint discusses laws and alleges
16 legal conclusions that do not require a response. Defendants lack information or knowledge
17 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
18 of this paragraph of Plaintiffs' Amended Complaint.

19 197. Paragraph 197 of Plaintiffs' Amended Complaint cites a law and alleges legal
20 conclusions that do not require a response. Defendants lack information or knowledge
21 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
22 of this paragraph of Plaintiffs' Amended Complaint.

1 198. Paragraph 198 of Plaintiffs' Amended Complaint cites laws and alleges legal
2 conclusions that do not require a response. Defendants lack information or knowledge
3 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
4 of this paragraph of Plaintiffs' Amended Complaint.

5 199. Paragraph 199 of Plaintiffs' Amended Complaint cites laws and alleges legal
6 conclusions that do not require a response. Defendants lack information or knowledge
7 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
8 of this paragraph of Plaintiffs' Amended Complaint.

9 200. Paragraph 200 of Plaintiffs' Amended Complaint cites a law and alleges legal
10 conclusions that do not require a response. Defendants lack information or knowledge
11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
12 of this paragraph of Plaintiffs' Amended Complaint.

13 201. Paragraph 201 of Plaintiffs' Amended Complaint cites a law and alleges legal
14 conclusions that do not require a response. Defendants lack information or knowledge
15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
16 of this paragraph of Plaintiffs' Amended Complaint.

17 202. Paragraph 202 of Plaintiffs' Amended Complaint cites laws and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 203. Paragraph 203 of Plaintiffs' Amended Complaint cites a law and alleges legal
22 conclusions that do not require a response. Defendants lack information or knowledge

1 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
2 of this paragraph of Plaintiffs' Amended Complaint.

3 204. Defendants deny the allegations of paragraph 204 of Plaintiffs' Amended
4 Complaint.

5 205. Paragraph 205 of Plaintiffs' Amended Complaint alleges a legal conclusion that
6 does not require a response. Defendants lack information or knowledge sufficient to form a
7 belief as to the truth of this allegation and therefore deny the allegation of this paragraph of
8 Plaintiffs' Amended Complaint.

9 206. Paragraph 206 of Plaintiffs' Amended Complaint cites laws and alleges legal
10 conclusions that do not require a response. Defendants lack information or knowledge
11 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
12 of this paragraph of Plaintiffs' Amended Complaint.

13 207. Paragraph 207 of Plaintiffs' Amended Complaint cites a law and alleges legal
14 conclusions that do not require a response. Defendants lack information or knowledge
15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
16 of this paragraph of Plaintiffs' Amended Complaint.

17 208. Paragraph 208 of Plaintiffs' Amended Complaint cites a law and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 209. Paragraph 209 of Plaintiffs' Amended Complaint cites a law and alleges legal
22 conclusions that do not require a response. Defendants lack information or knowledge

1 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
2 of this paragraph of Plaintiffs' Amended Complaint.

3 210. Paragraph 210 of Plaintiffs' Amended Complaint alleges legal conclusions that
4 do not require a response. Defendants deny the allegations regarding the temporary
5 modification and lack information and knowledge sufficient to form a belief as to the
6 remaining allegations of this paragraph and therefore deny the remaining allegations of this
7 paragraph of Plaintiffs' Amended Complaint.

8 211. Paragraph 211 of Plaintiffs' Amended Complaint alleges legal conclusions that
9 do not require a response. Defendants deny the allegations regarding the temporary
10 modification and lack information and knowledge sufficient to form a belief as to the
11 remaining allegations of this paragraph and therefore deny the remaining allegations of this
12 paragraph of Plaintiffs' Amended Complaint.

13 212. Paragraph 212 of Plaintiffs' Amended Complaint cites laws and alleges legal
14 conclusions that do not require a response. Defendants lack information or knowledge
15 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
16 of this paragraph of Plaintiffs' Amended Complaint.

17 213. Paragraph 213 of Plaintiffs' Amended Complaint cites a law and alleges legal
18 conclusions that do not require a response. Defendants lack information or knowledge
19 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
20 of this paragraph of Plaintiffs' Amended Complaint.

21 214. Paragraph 214 of Plaintiffs' Amended Complaint cites laws and alleges legal
22 conclusions that do not require a response. Defendants lack information or knowledge

1 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
2 of this paragraph of Plaintiffs' Amended Complaint.

3 215. Paragraph 215 of Plaintiffs' Amended Complaint cites laws and alleges legal
4 conclusions that do not require a response. Defendants deny that the CAD files are contrary
5 to any public policy and lack information or knowledge sufficient to form a belief as to the
6 truth of the remaining allegations and therefore deny the allegations of this paragraph of
7 Plaintiffs' Amended Complaint.

8 216. Paragraph 216 of Plaintiffs' Amended Complaint cites a law and alleges legal
9 conclusions that do not require a response. Defendants lack information or knowledge
10 sufficient to form a belief as to the truth of these allegations and therefore deny the allegations
11 of this paragraph of Plaintiffs' Amended Complaint.

12 217. Defendants deny the allegations of paragraph 217 of Plaintiffs' Amended
13 Complaint.

14 218. In response to paragraph 218 of Plaintiffs' Amended Complaint, Defendants
15 repeat the foregoing responses to the above allegations as though fully set forth herein.

16 219. Paragraph 219 of Plaintiffs' Amended Complaint alleges a legal conclusion that
17 does not require a response. To the extent a response is required, Defendants deny the
18 allegations of this paragraph of Plaintiffs' Amended Complaint.

19 220. Defendants deny the allegations of paragraph 220 of Plaintiffs' Amended
20 Complaint.

21 221. Defendants deny the allegations of paragraph 221 of Plaintiffs' Amended
22 Complaint.

1 222. In response to paragraph 222 of Plaintiffs' Amended Complaint, Defendants
2 deny that any Congressional notification or Secretary of Defense concurrence was required
3 and therefore deny the allegations of this paragraph of Plaintiffs' Amended Complaint.

4 223. Defendants lack information or knowledge sufficient to form a belief as to the
5 truth of the allegations at paragraph 223 of Plaintiffs' Amended Complaint and therefore deny
6 the allegations of this paragraph of Plaintiffs' Amended Complaint.

7 224. Defendants deny the allegations of paragraph 224 of Plaintiffs' Amended
8 Complaint.

9 225. Paragraph 225 of Plaintiffs' Amended Complaint alleges legal conclusions that
10 do not require a response. To the extent a response is required, Defendants deny the allegations
11 of this paragraph of Plaintiffs' Amended Complaint.

12 226. Defendants deny the allegations of paragraph 226 of Plaintiffs' Amended
13 Complaint.

14 227. Defendants deny the allegations of paragraph 227 of Plaintiffs' Amended
15 Complaint.

16 228. Defendants deny the allegations of paragraph 228 of Plaintiffs' Amended
17 Complaint.

18 229. In response to paragraph 229 of Plaintiffs' Amended Complaint, Defendants
19 repeat the foregoing responses to the above allegations as though fully set forth herein.

20 230. Paragraph 230 of Plaintiffs' Amended Complaint alleges a legal conclusion that
21 does not require a response. To the extent a response is required, Defendants deny the
22 allegations of this paragraph of Plaintiffs' Amended Complaint.

1 231. In response to paragraph 231 of Plaintiffs' Amended Complaint, Defendants
2 deny that any Congressional notification or Secretary of Defense concurrence was required
3 and therefore deny the allegations of this paragraph of Plaintiffs' Amended Complaint.

4 232. Defendants deny the allegations of paragraph 232 of Plaintiffs' Amended
5 Complaint.

6 233. Defendants deny the allegations of paragraph 233 of Plaintiffs' Amended
7 Complaint.

8 234. Defendants deny the allegations of paragraph 234 of Plaintiffs' Amended
9 Complaint.

10 235. In response to paragraph 235 of Plaintiffs' Amended Complaint, Defendants
11 repeat the foregoing responses to the above allegations as though fully set forth herein.

12 236. Paragraph 236 of Plaintiffs' Amended Complaint alleges a legal conclusion that
13 does not require a response. To the extent a response is required, Defendants deny the
14 allegations of this paragraph of Plaintiffs' Amended Complaint.

15 237. Paragraph 237 of Plaintiffs' Amended Complaint alleges legal conclusions that
16 do not require a response. To the extent a response is required, Defendants deny the allegations
17 of this paragraph of Plaintiffs' Amended Complaint.

18 238. Defendants deny the allegations of paragraph 238 of Plaintiffs' Amended
19 Complaint.

20 239. Defendants deny the allegations of paragraph 239 of Plaintiffs' Amended
21 Complaint.

22 240. Defendants deny the allegations of paragraph 240 of Plaintiffs' Amended

1 Complaint.

2 241. In response to paragraph 241 of Plaintiffs' Amended Complaint, Defendants
3 repeat the foregoing responses to the above allegations as though fully set forth herein.

4 242. Paragraph 242 of Plaintiffs' Amended Complaint alleges legal conclusions that
5 do not require a response. To the extent a response is required, Defendants deny the allegations
6 of this paragraph of Plaintiffs' Amended Complaint.

7 243. Paragraph 243 of Plaintiffs' Amended Complaint alleges legal conclusions that
8 do not require a response. To the extent a response is required, Defendants deny the allegations
9 of this paragraph of Plaintiffs' Amended Complaint.

10 244. Defendants deny the allegations of paragraph 244 of Plaintiffs' Amended
11 Complaint.

12 245. Defendants deny the allegations of paragraph 245 of Plaintiffs' Amended
13 Complaint.

14 246. Defendants deny the allegations of paragraph 246 of Plaintiffs' Amended
15 Complaint.

16 247. Defendants deny the allegations of paragraph 247 of Plaintiffs' Amended
17 Complaint.

18 Defendants deny each and every material allegation not heretofore controverted and
19 demand strict proof thereof.

20 **DEFENSES & AFFIRMATIVE DEFENSES**

21 Defendants allege and assert the following separate, alternative, and affirmative
22 defenses in response to the allegations in Plaintiffs' Amended Complaint.

- 1 1. The Court lacks subject-matter jurisdiction.
- 2 2. The Court lacks personal jurisdiction over Defense Distributed.
- 3 3. Venue is not proper in this Court.
- 4 4. Plaintiffs fail to state a claim upon which relief can be granted.
- 5 5. Plaintiffs will be unable to meet their burden of proof.

6 Defendants may have additional affirmative defenses, which are not yet known, but
7 which may become known through discovery.

8 **DEFENDANTS' REQUEST FOR RELIEF**

9 WHEREFORE, having fully answered Plaintiffs' Amended Complaint, Defendants
10 respectfully pray that the Court deny Plaintiffs any relief, enter judgment in favor of
11 Defendants and against Plaintiffs, and dismiss this case in its entirety with prejudice.

12 DATED this 20th day of August, 2018.

13 BECK REDDEN LLP

14 FARHANG & MEDCOFF

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CERTIFICATE OF SERVICE

I certify that on August 20, 2018, I served the foregoing by filing it with the Court's CM/ECF system, which automatically notifies all counsel of record.

I CERTIFY UNDER PENALTY OF PERJURY under the laws of the United States of America that the foregoing is true and correct.

DATED this August 20, 2018.

FARHANG & MEDCOFF

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